

IN RE:

MICHAEL FRANTZ PHILLIPS and  
ROCHELLE PHILLIPS,

Debtors

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CHAPTER 13

BKRTCY. NO. 19-12980 pmm

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Michael and Rochelle Phillips, by and through their counsel, Kevin K. Kercher, Esquire, have filed a Motion to Reinstate the Automatic Stay with respect to PNC Bank, N.A. with the Court to allow the Debtors to become current on post-petition mortgage payments and regain the benefit of the stay under the Code. The Debtors are prepared to bring the account current and also pay some post-petition defaults through a modified plan.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, If you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **July 10, 2023** you or your attorney must do all of the following:

(a) file an answer explaining your position at

**Clerk, U.S. Bankruptcy Court  
Eastern District of Pennsylvania  
The Gateway Bldg., Ste. 103  
201 Penn Street  
Reading, PA 19601**

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail/e-mail a copy to the movant's attorney:

**Kevin K. Kercher, Esquire  
881 Third Street, Suite #C-2  
Whitehall, PA 18052  
(610) 264-4120 phone/(610) 264-2990 fax**

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on **July 18, 2023 at 10:00** in Courtroom #1, 4<sup>th</sup> Floor, United States Bankruptcy Court, 201 Penn Street, Reading, Pennsylvania, 19601.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

Date: 6/26/2023

Attorney for Movants

/s/ Kevin K. Kercher  
**Kevin K. Kercher, Esquire**